

# **EXHIBIT 4**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

JANE DOE 1, individually and on  
behalf of all others similarly  
situated,

Plaintiff,

Case No.

-against-

1:22-cv-10019-JSR

JPMORGAN Chase BANK NA,  
Defendants.

- - - - - x

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x

GOVERNMENT OF THE UNITED STATES VIRGIN  
ISLANDS,

Plaintiff

Vs.

JPMORGAN CHASE BANK, N.A.

-----x

C O N F I D E N T I A L

Videotaped oral deposition of  
FRANCIS PEARN taken pursuant to notice,  
was held at BOIES SCHILLER FLEXNER LLP,  
commencing May 30, 2023, 9:34 a.m., on  
the above date, before Leslie Fagin, a  
Court Reporter and Notary Public in the  
State of New York.

MAGNA LEGAL SERVICES  
(866) 624-6221

1 F Pearn

2 customer? 14:00:22

3 A. Sorry, what do you mean and that 14:00:26

4 customer? 14:00:29

5 Q. Did Epstein have a role in 14:00:29

6 introducing JPMorgan to Leon Black or 14:00:31

7 expanding his accounts at JPMorgan? 14:00:34

8 MR. BUTTS: Object to form. 14:00:37

9 You may answer. 14:00:38

10 A. As the founder and one of the 14:00:39

11 senior leaders at Apollo Global Management, 14:00:44

12 the bank had a long established relationship 14:00:47

13 with Apollo and with Mr. Black. 14:00:50

14 My understanding is that Leon Black 14:00:57

15 was one of Mr. Epstein's clients as a money 14:01:01

16 manager. And as far as I've been able to 14:01:05

17 determine, we don't see any -- or I don't see 14:01:12

18 any introduction of Leon Black as a private 14:01:16

19 bank client through Mr. Epstein. 14:01:21

20 Q. What about Bill Gates, what's your 14:01:23

21 understanding of the relationship between 14:01:26

22 Jeffrey Epstein and Bill Gates and did he 14:01:29

23 facilitate either the creation of accounts 14:01:32

24 with JPMorgan or an expansion of his business 14:01:36

25 with JPMorgan? 14:01:38

1 F Pearn

2 MR. BUTTS: That's a compound 14:01:39

3 question. He can answer them one at a 14:01:40

4 time, but not both. 14:01:42

5 A. The first, I am aware of Bill 14:01:43

6 Gates' knowing and relationship with Epstein, 14:01:47

7 again, through the press, photographs and 14:01:52

8 such, and Mr. Gates' comments about 14:01:56

9 unfortunately knowing Epstein. That's that. 14:02:01

10 On the second, I have not seen any 14:02:06

11 evidence or any documents that would indicate 14:02:08

12 that Jeffrey Epstein was involved in bringing 14:02:12

13 Bill Gates to JPMorgan as a private bank 14:02:19

14 client. We had a long established 14:02:23

15 relationship with Mr. Gates as well as 14:02:28

16 Mr. Black at the institution. 14:02:30

17 Q. Are you aware of a project that 14:02:31

18 Bill Gates and Jeffrey Epstein were involved 14:02:33

19 in in 2011 to 2013 concerning the 14:02:35

20 establishment of a fund for charitable 14:02:40

21 donations? 14:02:43

22 MR. BUTTS: Objection. 14:02:44

23 You may answer. 14:02:45

24 A. I am aware of that initiative, yes. 14:02:45

25 Q. What is your understanding of that 14:02:48